

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ZENIMAX MEDIA INC. and
ID SOFTWARE LLC,

Plaintiffs,

V.

OCULUS VR, LLC,
PALMER LUCKEY,
and FACEBOOK, INC.

Defendants.

CIVIL CASE NO. 3:14-cv-01849-P

**ZENIMAX APPENDIX (VOL. 1) TO ITS OPPOSITION TO
DEFENDANTS' MOTION FOR PROTECTIVE ORDER AND TO QUASH**

VOL. 1

<u>DOCUMENT</u>	<u>EXHIBIT</u>	<u>PAGE(S)</u>
Letter from P. Anthony Sammi to G. Howard regarding Facebook-Oculus merger (dated July 22, 2014)	1	1-2
Letter from P. Anthony Sammi to G. Howard regarding Facebook-Oculus merger (dated July 24, 2014)	2	3-4
Letter and attachments from G. Howard to P. Anthony Sammi regarding production of documents related to Facebook-Oculus merger, dated July 25, 2014	3	5-18
Email and attachments from J. Dalton to P. Anthony Sammi regarding production of documents related to Facebook-Oculus merger, dated July 28, 2014	4	19-39
Oculus VR, LLC (Successor By Merger To Oculus VR, Inc.) and Palmer Luckey's Initial Disclosures, dated July 23, 2014	5	40-49
Letter from J. Dalton to K. Hemr attaching Defendants' First Set of Interrogatories and Requests for Production of Documents and Things to Plaintiffs, dated July 11, 2014	6	50-89

Defendants' Second Set of Interrogatories To Plaintiffs (Interrogatories Nos. 6-8), dated August 1, 2014	7	90-100
Letter from P. Anthony Sammi to G. Howard attaching Plaintiffs' responses to Defendants' First Set of Interrogatories and Requests for Production, dated August 11, 2014	8	101-222
Letter from P. Anthony Sammi to G. Howard attaching Plaintiffs' responses to Defendants' First and Second Set of Interrogatories, dated August 29, 2014	9	223-261
Letter from J. Pak to G. Howard regarding Plaintiffs' first production of documents, dated August 22, 2014	10	262-263
Letter from P. Anthony Sammi to G. Howard regarding Plaintiffs' second production of documents, dated September 5, 2014	11	264-266
Letter from P. Anthony Sammi to G. Howard regarding Plaintiffs' third production of documents, dated September 11, 2014	12	267-268
Letter from P. Anthony Sammi to G. Howard regarding Plaintiffs' fourth production of documents, dated September 18, 2014	13	269-270
Letter from P. Anthony Sammi to G. Howard regarding Plaintiffs' fifth production of documents, dated September 26, 2014	14	271-272
Declaration of P. Anthony Sammi, dated October 1, 2014	15	273-276
E-mail chain between J. Dalton and P. Anthony Sammi regarding meet and confer on motion to compel, motion for protective order, discovery as to Defendant Facebook, Inc., and identification of trade secrets, dated September 11, 2014	16	277-280
Letter from P. Anthony Sammi to G. Howard regarding Defendants' August 22, 2014 letter on Plaintiffs' responses to Defendants' First Set of Interrogatories, dated August 28, 2014	17	281-285
Email from John Carmack to Director of Information Technology at id Software, Duncan Welch, regarding "outside line?", dated August 10, 2011	18	286-287

VOL. 2

<u>DOCUMENT</u>	<u>EXHIBIT</u>	<u>BATES RANGE</u>
ZeniMax will propose that this document be filed under seal	19	P0000077-P0000077
ZeniMax will propose that this document be filed under seal	20	P0000075-P0000076
ZeniMax will propose that this document be filed under seal	21	P0013012-P0013016
ZeniMax will propose that this document be filed under seal	22	P0013003-P0013004
ZeniMax will propose that this document be filed under seal	23	P0000077-P0000077
ZeniMax will propose that this document be filed under seal	24	P0012990-P0012990
ZeniMax will propose that this document be filed under seal	25	P0012988-P0012989
ZeniMax will propose that this document be filed under seal	26	P0012979-P0012980
ZeniMax will propose that this document be filed under seal	27	P0013037-P0013040
ZeniMax will propose that this document be filed under seal	28	P0013017-P0013020
ZeniMax will propose that this document be filed under seal	29	P0010235-P0010235
ZeniMax will propose that this document be filed under seal	30	P0013029-P0013032
ZeniMax will propose that this document be filed under seal	31	P0013009-P0013011
ZeniMax will propose that this document be filed under seal	32	P0000074-P0000074

ZeniMax will propose that this document be filed under seal	33	P0013041-P0013042
ZeniMax will propose that this document be filed under seal	34	P0013036-P0013036
ZeniMax will propose that this document be filed under seal	35	P0013029-P0013032
ZeniMax will propose that this document be filed under seal	36	P0013037-P0013040
ZeniMax will propose that this document be filed under seal	37	P0013001-P0013002
ZeniMax will propose that this document be filed under seal	38	P0012993-P0012997
ZeniMax will propose that this document be filed under seal	39	P0013021-P0013028
ZeniMax will propose that this document be filed under seal	40	P0012985-P0012987
ZeniMax will propose that this document be filed under seal	41	P0013037-P0013040
ZeniMax will propose that this document be filed under seal	42	P0013021-P0013028
ZeniMax will propose that this document be filed under seal	43	P0013009-P0013011
ZeniMax will propose that this document be filed under seal	44	P0012998-P0013000
ZeniMax will propose that this document be filed under seal	45	P0012991-P0012992
ZeniMax will propose that this document be filed under seal	46	P0013036-P0013036
ZeniMax will propose that this document be filed under seal	47	P0012991-P0012992
ZeniMax will propose that this document be filed under seal	48	P0012985-P0012987

ZeniMax will propose that this document be filed under seal	49	P0013005-P0013008
ZeniMax will propose that this document be filed under seal	50	P0012984-P0012984
ZeniMax will propose that this document be filed under seal	51	P0013005-P0013008
ZeniMax will propose that this document be filed under seal	52	P0013037-P0013040
ZeniMax will propose that this document be filed under seal	53	P0013001-P0013002
ZeniMax will propose that this document be filed under seal	54	P0013043-P0013044
ZeniMax will propose that this document be filed under seal	55	P0010191-P0010191
ZeniMax will propose that this document be filed under seal	56	P0013033-P0013034
ZeniMax will propose that this document be filed under seal	57	P0013017-P0013020
ZeniMax will propose that this document be filed under seal	58	P0000457-P0000457

Dated: October 1, 2014

Respectfully submitted,

s/ Phillip B. Philbin

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CERTIFICATE OF SERVICE

On October 1, 2014, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case files system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

Dated: October 1, 2014

s/ Phillip B. Philbin

Phillip B. Philbin